

Exhibit D

From: Marc Wolstenholme <marc@mwwolf-fiction.co.uk>
Sent: Wednesday, January 1, 2025 4:37 AM
To: Geller, Joshua
Subject: Re: Wolstenholme v. Riot Games - Rule 7-3 Meet and Confer

Thanks Josh,

Happy new year,

Hope you had a good one.

Is this your official answer to the summons?

As I understand it, the long form didn't need to be filed in the final form till after the litigation discovery plan?

I can file the long form,

I will conter all motions to dismiss pleas.

I'll just keep coming over and over, I'll keep battling for the rest of my days.

I'll change up the cases how I must and I'll find a way. As we know, I am trying to navigate litigation in the US from the UK.

I have several disadvantages, such as money, power, disabilities and vulnerabilities and dyslexia, thus I'll be asking the court to take the necessary steps to ensure we are all equal under law.

There is simply no way that Riot are getting away with it. It would be better for everyone to get this over.

We can sit down and find a win-win situation. Riot have already profited from my work. It's time for them to thank me.

A Meet and Confer would be beneficial to both parties. The sooner the better. Jan would be great, is Riot prepared to organize and pay for my trip to LA?

I have important cases on the 7th and 8th of January. both of which are very taxing on my health as they are directly related to the past. May I ask that you hold off all actions until then, for my health purposes?

Again Thanks Josh,

Marc Wolstenholme

On Tue, 31 Dec 2024 at 22:23, Geller, Joshua <jgeller@greenbergglusker.com> wrote:

Dear Mr. Wolstenholme,

I'm writing to let you know about some upcoming steps that Riot intends to take in your case and to clarify a few procedural points.

First, Riot plans to remove the case from Los Angeles Superior Court to the United States District Court for the Central District of California, pursuant to 28 U.S.C. § 1441. This is because you're asserting a claim for copyright infringement, which federal law requires to be heard and decided exclusively in federal court. Your complaint was filed in state court (Los Angeles Superior Court), which does not have jurisdiction over copyright claims.

Once the case is in federal court, Riot intends to file a motion to dismiss for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6) or, in the alternative, for a more definite statement under Federal Rules of Civil Procedure 12(e). We are writing to "meet and confer" with you regarding that anticipated motion, pursuant to Central District of California Local Rule 7-3.

As you know, the complaint you filed in Los Angeles Superior Court is only a "short form" complaint which does not contain any details about your allegations. The various longer versions of your complaint that you have emailed us have not been officially filed with the Court, and therefore they are not pleadings in the case that may be relied upon. Accordingly, you have not complied with the pleading standard of Federal Rule of Civil Procedure 8(a), which requires, among other things, a legally sufficient statement of your claims.

Riot plans to file its notice of removal on January 6, 2025, and its motion to dismiss on January 13, 2025. You may be able to correct the above deficiencies in your complaint by dismissing your state court action and filing a more detailed complaint in federal court, though we do not believe you will be able to state any viable or cognizable claims against Riot in any event. We reserve the right to move to dismiss any such further complaints you file.

We again encourage you to consult with an attorney about the procedural and substantive deficiencies in your case.

Sincerely,

Josh Geller

Joshua Geller

Partner

[Biography](#) | [vCard](#)

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